36987

COMMENTS ON SITE OPERATIONS PLAN

FOR NATIONAL GYPSUM COMPANY

ASBESTOS DUMP

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New York, New York

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Title Cover - Pine Valley Tree Service should be changed to (257 New Vernon Road). This change should be made throughout the SOP.

Section 2.2, Page 2-2, Paragraph 2 - "Should an immediate health hazard exist, action must be expeditiously, taken with the approval of EPA and NJDEP to mitigate the danger to the public."

This sentence must be added to ensure that the public well being is protected.

Section 2.8.1., Page 2-4, Paragraph 2 - All sampling equipment must be certified laboratory clean.

Section 2.8.1., Page 2-5 - All four (4) inch well borings will be advanced with an eight (8) inch inside diameter hollow stem auger and borings for six (6) inch wells will be advanced with a ten-inch inside diameter hollow stem auger.

The following decontamination procedure must be utilized for field clean up when necessary:

- Initial wash with Alconox detergent
- Tap water rinse
- Deionized water rinse
- Solvent rinse (methanol or acetone)
- Air-dry or deionized rinse

Page 2-7 Millington Site

All split spoon samples must be monitored for head space analysis with an Organic Analyzer (OVA) and a Photo Ionization Detector (PID).

ABD 002 0175

The monitor well shall be advanced with an eight (8) inch inside diameter hollow stem auger. All well casings and screens must be stainlen steel.

Page 2-8 Millington Site (Figure 2-2)

The NJDEP well specification on page A-10 and A-11 of Appendix 1 of the Consent Order must be used. [Please provide the documentation for the estimate of 10 feet of open hole.]

Page 2-9 Millington Site

All monitoring wells must have the well permit number permanently affixed to each monitoring well. All four (4) inch borings must be advanced using an eight (8) inch inside diameter hollow stem auger. All well casings and screens must be stainlen steel.

Page 2-10 Figure 2-3

The NJDEP well specification on page A-12 Appendix 1 of the Consent Order must be used.

Page 2-12, White Bridge Road and Pine Valley Tree Service Site

Delete the reference to Pine Valley Tree Service Sites. [All monitoring wells must be allowed to rest for a minimum of two (2) weeks after development prior to being sampled.]

Page 2-16, Section 2.8.4

What size sieve will be used for the particle size analysis.

Page 2-18, 19&23, 2.10.1 Surface Water and Sediment Sampling (Subtask 10.1)

The agency is requesting that the following points include sediment sampling.

1. Passaic River

   The Northern most sample above the confluence with the Great Brook.

2. Great Brook

   Above confluence with the Passaic River.

3. Middle Brook

Above Confluence with Black Brook.
See attached diagram.

Page 2-23 & Page 2-26

The decontamination procedure for sampling equipment (including bailer) between samples should include hexane and deionized water rinse following the methanol rinse.

Page 2-23

The homogenization procedure described for replicate sampling is not acceptable for use on volatile organic samples. Replicate volatile samples cannot be mixed because of the possibilities of loss of some constitutents.

Page 2-24, Section 2.10.2

The stated purpose of the air sampling, is to identify whether significated amount of asbestos would be released during any remedial action. The difference in effect between drilling a four-inch hole and a four-foot trench is quite significant. We do not need any sampling to tell us that enormous numbers of asbestos fibers would be released during the digging of a pile of dry friable or even semi-friable asbestos containing debris. During any subsequent remedial work, the uncovered fill would probably need to be wetted almost continuously and kept wet during all stages of collection and handling to minimize the release of fibers. Thus we recommend that you use the data collected during the four-inch hole rilling and try to simulate what would happen during excavation of a four-foot hole.

Page 2-26

The bailer must have a cord attached which is composed of Teflon coated wire, single strand stainless steel wire or chain or polypropylene monofilament. Nylon cord is not acceptable.

Field filtering is only acceptable for samples collected for metal analysis, all other samples must not be filtered. In addition, all filtering apparatus must be certified laboratory clean and dedicated to each sampling point.

Page 2-26 and Short Form Table 5-2

We do not accept dissolved metals analyses. The more comprehensive total metals analysis is preferred.

Page 2-29

The sampling procedure for a tap or spigot should include the removal of any aerating to avoid loss of volatile compounds.

Short Form, Page 5-2

Copies of the "Modified" methods 608, 624 and 625 must be included. Also, the use of sodium thiosulfate in volatile organics is only recommended if residual chlorine is present. It is not a preservative. The holding time for volatile organics without acid preservative is 7 days not 14, according to 4 CFR 136, October 26, 1984.

Short Form Table 5-3

This table in conjunction with 5-1 is somewhat confusing. It should state that for every matrix, 10% of the samples will be collected in duplicate and that a trip blank shall accompany every shipment of volatile organics samples. Field blanks are not required, but are optional.

Page 5-15

Each bottle label should include the following information:

1. site name
2. sample number
3. name of collector
4. date and time of collection
5. place of collection
6. type of sample (comp/grab)
7. sample volume
8. analysis required
9. Preservatives

Page 6-3, Section 6-2

What is the assignment of specific roles and responsibilities to each member of the field team? How much will each member of the team be responsible for?

An organizational structure should be provided to show the delegation of authority.

Page 6-5, Section 6.2.3

In monitoring the work party for signs of stress, what will you be monitoring and how will it be done?

Health and Safety Plan

Page 6-6, Section 6.3.1

Will higher levels of protection be made available in the event (its) needed? Will the third (3rd) team member be dressed in the same level of protection?

Page 6-6, Section 6.4

The procedures or rationale to be applied in selecting, using and maintaining Personal Protective Equipment must be stated.

Page 6-7, Section 6.4.1.

In selecting adequate respiratory protection, what about: exposure limits; oxygen level; warning properties; protection factor; maximum use limit and service concentration limit?

Page 6-8, Section 6.4.1.1, Paragraph 1

How will you determine the minimal concentration in any given area?

Page 6-9, Section 6.4.1.1, Paragraph 6

"Dizziness" is not considered as a warning property, it is an effect that implies over exposure.
What is "other distress"?

Page 6-9, Section 6.4.2, Paragraph 1

Will the chemical safety glasses provide splash protection?

Page 10, Section 6.4.2.1, Paragraph 1

What is "Modified Level D"? Level D protection cannot be accepted on site.

Page 10, Section 6.4.2.1

Is the "Modified" Level D protection referring to the Air-purifying respirator?

Page 6-14, Section 6.6.2, Paragraph 2

What is the rational behind the 25 ppm volatile organics and the 30,000 fibers/liter.